

FILED

AUG 03 1995

LAW OFFICES OF ROBERT SUSSER, P.C.
47 Reckless Place, P.O. Box 608
Red Bank, New Jersey 07701
(908) 219-9700
Attorney for Douglas Zimmel, D.C.

NEW JERSEY BOARD OF
CHIROPRACTIC EXAMINERS

STATE OF NEW JERSEY
DEPARTMENT OF LAW & PUBLIC SAFETY
DIVISION OF CONSUMER AFFAIRS
BOARD OF CHIROPRACTIC EXAMINERS
DOCKET NO.

IN THE MATTER OF THE SUSPENSION:
OR REVOCATION OF THE LICENSE OF:

Administrative Action

Douglas Zimmel, D.C.
License No. MC03245

ANSWER TO COMPLAINT

TO PRACTICE CHIROPRACTIC IN THE:
STATE OF NEW JERSEY

DOUGLAS ZIMMEL, D.C. by way of Answer to the Complaint of the
Board of Chiropractic Examiners, says:

COUNT ONE

1. Respondent has insufficient information upon which to form
a belief as to the allegations contained in Count One, Paragraph
One, of the Complaint and leaves Complainant to its proofs.

2. Respondent has insufficient information upon which to form
a belief as to the allegations contained in Count One, Paragraph
Two, of the Complaint and leaves Complainant to its proofs.

3. Respondent admits the allegations contained in Count One,
Paragraph Three of the Complaint.

4. Respondent admits that he treated a patient by the name of
Brian McLean but denies the remaining allegations contained in
Count One, Paragraph Four of the Complaint.

5. Respondent denies the allegations contained in Count One,

Paragraph Five of the Complaint.

6. Respondent denies the allegations contained in Count One, Paragraph Six of the Complaint.

7. Respondent denies the allegations contained in Count One, Paragraph Seven of the Complaint.

8. Respondent denies the allegations contained in Count One, Paragraph Eight of the Complaint.

9. Respondent denies the allegations contained in Count One, Paragraph Nine of the Complaint.

10. Respondent denies the allegations contained in Count One, Paragraph Ten of the Complaint.

WHEREFORE, Respondent demands Judgment dismissing Count One of the Complaint with prejudice.

COUNT TWO

1. Respondent repeats his answer to the allegations contained in Count One of the Complaint as if set forth more fully herein.

2. Respondent denies the remaining allegations contained in Count Two of the Complaint.

WHEREFORE, Respondent demands Judgment dismissing Count Two of the Complaint with Prejudice.

SEPARATE DEFENSES

1. The Complaint is barred by the Doctrine of Latches.

2. The Complaint is barred by the Doctrine of Estoppel and Equitable Estoppel.

3. The Complaint is barred by the Doctrine of Unclean Hands.

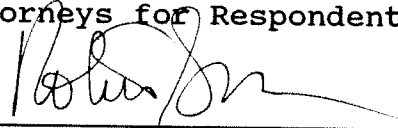
4. The Complaint fails to set forth a cause of action upon

which relief may be granted.

5. The Complaint violates the Respondent's constitutional right to substantive and procedural due process of law.

6. The Complaint should be dismissed based upon a lack of jurisdiction.

LAW OFFICES OF ROBERT SUSSER, P.C.
Attorneys for Respondent

A handwritten signature in dark ink, appearing to read 'Robert Susser', is written over a horizontal line.

BY: ROBERT SUSSER

Dated: July 26, 1995